

NJID 752190

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Attorneys for SETERUS, INC., AS AUTHORIZED SUBSERVICER FOR FEDERAL
NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE"), A CORPORATION
ORGANIZED AND EXISTING UNDER THE LAWS OF THE UNITED STATES OF AMERICA

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
CAROL A. LIGHTNER A/K/A CAROL
LIGHTNER : CASE NO. 12-39575-KCF
Debtor(s) : **NOTICE OF MOTION FOR
RELIEF FROM AUTOMATIC
STAY PURSUANT TO 11 USC
SECTION 362(d)**

CAROL A. LIGHTNER A/K/A CAROL LIGHTNER
2 BUCKNELL LN
WILLINGBORO, NJ 08046

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LAW OFFICES OF KEVIN FAYETTE, LLC
1675 WHITEHORSE MERCERVILLE ROAD
SUITE 204
HAMILTON, NJ 08619

ALBERT RUSSO
STANDING CHAPTER 13 TRUSTEE
CN 4853
TRENTON, NJ 08650-4853

PLEASE TAKE NOTICE that on 03/28/2018 @9:00AM or as soon as counsel may be heard, the undersigned attorney for the secured creditor will move before the United States Bankruptcy Court, 402 E. STATE STREET, TRENTON,, New Jersey for an Order Vacating the Automatic Stay with respect to property located at 2 BUCKNELL LANE, WILLINGBORO, NJ 08046-1602 and allowing SETERUS, INC., AS AUTHORIZED SUBSERVICER FOR FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE"), A CORPORATION ORGANIZED AND EXISTING UNDER THE LAWS OF THE UNITED STATES OF AMERICA to continue its contractual remedies or other remedies that may be available under state law, by reason of failure of the debtor to make regular monthly mortgage payments outside the Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, the Movant will rely upon the Certification in Support and the proposed Order submitted herewith, as well as, oral arguments, if necessary. Pursuant to D.N.J. LBR 9013-2, Movant states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

Dated: February 8, 2018

/s/ Sherri J. Braunstein

Sherri J. Braunstein, Esq.

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